

claimed, and by arguing that denoting an angle as positive or negative is arbitrary. In doing so, the Action ignores the fundamental aspect of this claim element, which is that the substrate and the rollers are arranged such that the substrate is pressed against the rollers by the wrap angle of the substrate. By contrast, the arrangement in Brown's Fig. 7 tends to pull the substrate away from the rollers and, accordingly, is exactly opposite to what is claimed.

Applicants also request reconsideration and withdrawal of the rejection of claim 1 and its dependent claims because, absent impermissible hindsight reconstruction of the invention, one of ordinary skill in the art would have had no motivation to combine the references in the manner suggested. The Action asserts that the motivations to combine the references are clearly laid out in the rejections mailed February 10, 2003. Applicants respectfully disagree.

The rejections mailed February 10, 2003, indicate that it would have been obvious to modify Brown in view of the admitted prior art because the apparatus of the admitted prior art "allows for the suitable plasma treatment of long substrates." As Brown is already directed to the plasma treatment of continuous material, the apparatus of Brown does not lack the ability to treat long substrates and, accordingly, nothing in Brown or the admitted prior art would have led one of ordinary skill in the art to employ the electrodes of the admitted prior art in the system of Brown.

Moreover, nothing in Brown or the admitted prior art would have led one of ordinary skill in the art to put a ground electrode in contact with each of the cylindrical rollers. Indeed, neither Brown nor the admitted prior art describes or suggests such an arrangement.

For each of the reasons discussed above, applicants request reconsideration and withdrawal of the rejection of claim 1 and its dependent claims.

Like claim 1, independent claim 3 recites a ground electrode in contact with each of a plurality of cylindrical rollers that are arranged such that a flexible substrate is in contact with each of the plurality of cylindrical rollers with a wrap angle kept positive to create a force in a direction pressing the flexible substrate against the plurality of cylindrical rollers. Accordingly, applicants request reconsideration and withdrawal of the rejection of claim 3 and its dependent claims for the reasons noted above with respect to claim 1.

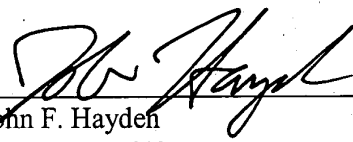
Like claims 1 and 3, independent claim 10 recites a plurality of cylindrical rollers that are arranged such that a flexible substrate is in contact with each of the plurality of cylindrical rollers with a wrap angle kept positive to create a force in a direction pressing the flexible substrate against the plurality of cylindrical rollers. As noted above, neither Brown, the admitted prior art, Misiano, nor any combination of these references describes or suggests such an arrangement. Accordingly, applicants request reconsideration and withdrawal of the rejection of claim 10 and its dependent claims for at least this reason.

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Respectfully submitted,

Date: _____

11/18/03



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